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The Honorable Stanley R. Chesler
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: United States v. Maria Bell
Case Number 2:21-cr-00015 (SRC)

Dear Judge Chesler:

The Government respectfully submits this letter in opposition to the Defendant Maria Bell's ("Bell" or "defendant") motion to revoke Magistrate Judge Cathy L. Waldor's most recent order of detention issued on March 24, 2021 ("Def. April Motion")¹.

The Government relies on the multiple response motions filed, including a 48-page submission addressed to this Court dated January 20, 2021 (Dkt. No. 3). These government submissions, and several hours of oral arguments, repeatedly established that: (i) there is clear and convincing evidence that no condition or combination of conditions can reasonably assure the safety of the community if Bell is released. See 18 U.S.C. § 3142(e)(f); and (ii) by a preponderance of the evidence, there is no condition or combination of conditions that can reasonably assure the presence of defendant at trial. See 18 U.S.C. § 3142(f); *United States v. Himler*, 797 F.2d 156, 160-61 (3d Cir. 1986). This was affirmed by the Magistrate Court three times, and by this Court on January 22, 2021.

The Def. April Motion is the defendant's fifth recycling of a combination legal and factual arguments that have been previously addressed and completely refuted by the government over the course numerous submissions and four Court hearings (Dkt. Nos. 3, 6, 7, 9, 11). Ultimately, the Magistrate Court provided thorough explanations in three decisions and orders denying the defendant's motions, and your honor similarly provided a thorough summary of all facts and arguments that led to this Court's decision and order, denying the Defendant's emergency appeal on January 22, 2021 (Dkt. No. 3).

¹ The first, second, and fourth orders of detention were issued Magistrate Judge Waldor, the third order of detention was issued by your Honor on January 28, 2021 (Dkt. No. 6).

The Def. April Motion should again be denied, and the defendant should remain detained pending trial. See 18 U.S.C. § 3142(e).

Respectfully submitted,

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cc: Rahul Sharma, Esq. (by electronic mail)